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memorandum

date September 13, 2006

to Aaron Akin, Planning Manager, City of San Bruno

from Jamie Dean, AICP - ESA Project Manager
Deborah Kirtman, AICP - ESA Project Director

subject **2396 Evergreen Drive: Response to Comments on the Draft Initial Study
(ESA 206065)**

This memorandum summarizes and responds generally to comments received on the Draft Mitigated Negative Declaration (MND) circulated by the City of San Bruno (City) staff as required by the California Environmental Quality Act (CEQA). As stated in CEQA Section 15074(b), “[p]rior to approving a project, the decisionmaking body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process.” A written response on comments received on a Draft MND is not required, but are provided in this case for the benefit of the public and decision-makers. Letters received on the Draft MND include:

Letter A	B. Asaro	August 21, 2006
Letter B	Elsa Ten Broeck and Philip Manriquez	September 5, 2006
Letter C	Ernesto and Eleanor Cadiz	August 23, 2006
Letter D	Steve Carlson, Senior Planner City of South San Francisco	September 4, 2006
Letter E	Alan and Maria Jacobs	September 6, 2006
Letter F	Erik and Miriam Roberson	September 5, 2006
Letter G	Gerald and Nancy Sonnenburg	September 5, 2006

Responses to Comments

Letter A: B. Asaro

Comment A-1: *Commenter voiced concerns regarding project traffic on local streets, air quality impacts from project traffic, noise impacts to new residents from airplanes, and soil stability on the project site.*

Response: The Draft MND addressed these topics in detail. Please see Sections 15 Transportation/Traffic, (pages 57-59); 3.c, Air Quality (page 17); 11.c, Noise (page 48); and 6.a, Geology and Soils (pages 25-28).

Comment A-2: *Suggests a second entrance/exit to and from the project site into the City of South San Francisco.*

Response: Under the proposed project, access to and from the project site onto Albright Way in South San Francisco would be maintained for emergency response vehicles, and would not be open to project residents or motorists cutting-through the project site. The addition of a second project entrance/exit onto Albright Way was analyzed in an addendum to the Traffic Impact Analysis (TIA) completed for the proposed project (DKS Associates, 2006). In summary, the addendum found that a second entrance/exit at the project site would provide an alternate route to Oakmont Drive, the primary residential collector street between the cities of San Bruno and South San Francisco. Under this scenario, slightly less project-related traffic would travel through the study intersections of Westborough Boulevard/Oakmont Drive, Avalon Drive/Valleywood Drive, and Avalon Drive/I-280 Ramps; however, the slight reduction would be minimal, and the conclusions summarized in the TIA would not change. Furthermore, because of anticipated traffic control measures, traffic calming features [e.g., bulb-outs, chicanes, speed humps, raised crosswalks, single-lane slow point, etc.] and narrow roadway widths through the project site, and the existing grade at the connection between Evergreen Drive and the project site, cut-through traffic would be expected to be minimal. Therefore, a second entrance/exit onto Albright Way in the City of South San Francisco would not substantially change travel patterns to and from the project site, presented in the TIA and the Draft MND (Section 15 Transportation/Traffic, pages 57-59).

Letter B: Elsa Ten Broeck and Philip Manriquez

Comment B-1: *Suggests stop signs at the intersection of Evergreen Drive and Maywood Drive, and at the intersection of Valleywood and Evergreen Drive.*

Response: Neither the existing traffic volumes, nor traffic conditions with implementation of the proposed project, warrant traffic control measures, such as stop signs, on nearby streets. The *Manual of Uniform Traffic Control Devices* (2004) provides guidelines to determine when traffic controls, such as stop signs become necessary. These guidelines take into consideration, among other things, the probability of vehicles arriving at an intersection at the same time, the length of time traffic must wait to enter, and the availability of safe crossing opportunities. A stop sign is intended to assist motorists and pedestrians at an intersection determine who has the right-of-way. Where stop signs are installed as “nuisances” or “speed breakers,” there is high incidence of intentional violation. In those locations where motorists do stop, the speed reduction is only effective in the immediate vicinity of the stop sign, and frequently speeds are actually higher between intersections. For these reasons, they should not be used as speed control devices. As a Condition of Approval, the project sponsor would be required to install a four-way stop control at the intersection of Evergreen Drive and Maywood Drive (Traffic/Street 36). No additional stop signs would be required by the City of San Bruno at this time; however, general requests for stop signs can be made through the Traffic and Safety Committee.

Comment B-2: *Concerns regarding project construction haul routes.*

Response: As discussed in the Draft MND (Section 15.a and 15.b, Transportation/Traffic), construction-related activities resulting from the project would result in short-term increases in traffic volumes, and would not result in any long-term degradation in operating conditions on nearby roadways. The temporary increase would not significantly disrupt daily traffic flow on any of the study area roadways.

As required by Mitigation Measure TRAF 1, “The project sponsor would ensure that project contractors comply with City of San Bruno requirements for haul routes, construction staging, etc., to minimize the short-term effects of project construction.” As required by the Conditions of Approval haul routes for construction shall also be reviewed and approved by the City Engineer (Construction 79) and shall pay the Haul Route Permit Fee as calculated from the Master Fee Schedule before starting earthwork (Grading 1). Additionally, upon completion of site grading and each development phase, the project sponsor shall repair all roads damaged by construction vehicles to the conditions existing prior to project construction and to the satisfaction of the City Engineer (Construction 80). These measures are intended to adequately address potential adverse affects during project construction.

Comment B-3: *Disagrees with the project trip generation.*

Response: As discussed further in Section 15, Transportation/Traffic of the Draft MND, the trip generation for the proposed project accounted for the prior use at the site, the children’s day care center that occupied the site until January 2006. Although the day care center is not currently in operation, it is considered an existing use on the site, since if the project is not constructed, this use would reoccupy the site without further environmental analysis. Therefore, the discount for day care trip generation is appropriately applied to the proposed project.

Comment B-4: *Suggests a second entrance/exit from the project site into South San Francisco.*

Response: See Response to Comment A-2.

Letter C: Ernesto and Eleanor Cadiz

Comment C-1: *Requests removal of trees located on the project site bordering their property.*

Response: As described in the project description of the Draft MND, as conditioned by the City of San Bruno, a number of trees would be removed as part of the proposed project (see page 5). This includes the removal of trees adjacent to the commenters’ residence.

Letter D: Steve Carlson, City of South San Francisco

Comment D-1: *Concern regarding capacity of drainage line in South San Francisco that would serve the project site.*

Response: As discussed in the Draft MND, Section 8.e, Hydrology and Water Quality, and Section 16.c, Utilities and Service Systems, the project would involve installation of a new stormwater drainage system, designed in accordance with the City's engineering standards. Pursuant to the Conditions of Approval, and a general City requirement for all new development, the proposed storm drainage system would be designed to receive 25-year storm, and the stormwater detention would be designed to contain a 100-year storm event (Drainage 35). Furthermore, the City of San Bruno would require the following measure as a condition of approval to assure that potential storm drainage capacity issues are resolved prior to project construction:

Supplement drainage analysis of the existing condition of drainage lines that will service the proposed development must be completed at the cost of the project sponsor prior to the approval of the final map. This report must provide an evaluation of the existing system including pipe condition and location of all defects and obstructions. The study should indicate where within the project site blockages are located. Repair options and debris removal within the line must be identified. The amended report must provide alternate means of evaluating the portion of line to Chateau Court which is stated in the original report as being unable to be video inspected. The report should include a site map and Château Court should also be indicated on the site plan. Measures recommended in the report must be implemented to the satisfaction of the City of San Bruno and City of South San Francisco Public Works Departments.

Comment D-2: *Requests study intersections within the City of South San Francisco be labeled as such.*

Response: Intersections within the City of South San Francisco and the City of San Bruno are indicated on the project location map.

Comment D-3: *Requests operations analysis of the intersection of Westborough and Gellert Boulevards.*

Response: The level of service (LOS) at the intersection of Westborough Boulevard and Gellert Boulevard is presented in **Table D-1**. As indicated in the table, the project would not substantially affect intersection operations under project conditions.

TABLE D-1
LEVELS OF SERVICE AT THE INTERSECTION OF WESTBOROUGH BOULEVARD / GELLERT BOULEVARD

Study Intersection	Existing Conditions				Background Conditions				Background plus Project Conditions			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	Delay ^a	LOS ^b	Delay ^a	LOS ^b	Delay ^a	LOS ^b	Delay ^a	LOS ^b	Delay ^a	LOS ^b	Delay ^a	LOS ^b
Westborough Boulevard / Gellert Boulevard	34.9	C	38.8	D	36.2	D	42.1	D	36.6	D	42.8	D

Comment D-4: *Questions the assumptions for background growth for the transportation analysis.*

Response: The traffic analysis conducted for the proposed project accounts for background growth generated by approved developments in the project site vicinity. For intersections within the City of South San Francisco, a 10 percent growth rate was applied to all intersection movements to account for potential project traffic that may be generated by approved projects, or projects currently under construction in the project site vicinity.

Comment D-5: *Questions regarding project trip generation.*

Response: See Response to Comment B-3.

Comment D-6: *Questions whether project traffic would increase intersection volumes at study intersections within South San Francisco by two percent.*

Response: As discussed in the Draft MND Sections 15.a-b, Transportation/Traffic, and the TIA, the of the project study intersections located in South San Francisco, including the intersections of Westborough Boulevard and I-280 Southbound Ramp, Westborough Boulevard and Oakmont Drive and Avalon Drive and I-280 Southbound Ramps operate at a LOS of C or better with the proposed project. The intersection I-280 Northbound Ramps and Avalon Drive operates at LOS E during the PM peak hour; however, the proposed project would add approximately 27 trips, or less than less than one percent (approximately 0.9 percent) to the traffic volume at this intersection. Therefore, none of the intersections in South San Francisco would meet the City's criteria for significant traffic impacts, and consistent with the discussion in the Draft MND and TIA, and would have a less than-significant effect on intersection service levels.

Comment D-7: *Does not support a second entrance/exit from the project site into South San Francisco.*

Response: See Response to Comment A-2.

Letter E: Maria and Alan Jacobs

Comment E-1: *Comment relates to changes in property lines along the project site's southern boundary as a result of the formal survey completed by project sponsor. Suggests the project sponsor complete improvements to private property (property not owned by the project sponsor) and the buffer area between the project site and existing residences.*

Response: As part of the proposed project, the project sponsor has conducted a formal survey of the site's existing property lines. This survey has resulted in changes to the size of some backyards for residences located along the north side of Evergreen Drive, in general, resulting in larger backyards than existing

fenced backyards. The project sponsor proposes to reconstruct existing fences, as necessary, to accurately delineate the property line. However, no additional improvements to private property (property that is not owned by the project sponsor), such as utility realignment or under-grounding, site grading, or landscaping, are proposed. Pursuant to the Conditions of Approval, the proposed Home Owners Association (HOA) for the project shall maintain the eucalyptus tree grove located on the southern side of the project site and all common landscaped areas on the project site (Parks and Recreation 1). In addition, and all eucalyptus trees on the project site will be cleaned, thinned, and maintained in accordance with certified arborist standards for such tree species (Parks and Recreation 3).

Comment E-2: *Adequacy of project parking supply.*

Response: As discussed further within the Draft MND (Section 15.f, Transportation/Traffic, page 59), the project would provide four off-street parking spaces per residence, plus a total of 48 on-street parking spaces. The provision of parking would exceed the requirement of the San Bruno Municipal Code (Section 12.100.090), which requires that single-family dwelling units provide two garage or carport parking spaces per unit for residential units less than 2,800 square feet, such as the project residences. The Institute of Transportation Engineers *Parking Generation Manual*, 3rd Edition, 2004 estimates an average peak parking demand of 1.83 spaces per single-family dwelling units. The proposed project would provide more than twice this estimated parking demand.

Additionally, pursuant to the Conditions of Approval, the Covenants, Conditions and Restrictions shall include wording which requires the garage be kept clear to allow the storage of two automobiles (Planning 5), and the length of driveways would be a minimum of 18 feet to allow two-car side-by-side parking (Fire Department 1C). The proposed size of garages (20 feet by 20 feet) and the lack of laundry facilities or other uses in the garages would allow adequate space for parking two vehicles. The requirements of the Conditions of Approval coupled with the garage design would allow for adequate resident parking on the project site, and additional measures, such as parking permit programs would not be necessary.

Comment E-3: *Suggests stop signs at the intersection of Evergreen Drive and Maywood Drive and “Children at Play” signs.*

Response: See Response to Comment B-1.

Installation of “Children at Play” signs warning motorists of the possible presence of children at play are often requested in residential neighborhoods, as many people believe that these signs enhance children's safety, but may not realize the safety concerns associated with use of these signs. Motorists are typically familiar with residential street characteristics, such as those surrounding the project site, including the presence of children. “Children at Play” signs tend to convey the message to motorists that children are present only where signs are installed; however, children can enter residential streets at many locations. Studies show that devices attempting to warn motorists of normal conditions that are not always present fail to achieve the desired safety benefits.

"Children at Play" signs can send the wrong message to children by encouraging play in the roadway, and children's interaction with automobiles could result in severe traffic safety consequences. Additionally, "Children at Play" signs can create a false belief for children that they are safer where signs are installed. Such signs have been ineffective in providing added protection for children, and the signs' presence could adversely affect children's safety on residential streets.

Another belief is that "Children at Play" signs and similar signs, such as "Slow" or "Slow - Entering Residential Area," help reduce vehicle speed along roadways. However, there is no evidence that these signs prevent accidents or reduce vehicle speeds. Special speed enforcement has proven to be the most effective method of reducing vehicle speed. "Children at Play" signs and similar signs are not recognized by the State or by the Federal Highway Administration (2004) as official traffic control devices. No installation of "Children at Play" signs would be required as part of the proposed project.

Comment E-4: *Emergency access at Sherwood Drive, and suggests design criteria.*

Response: As discussed further within the Draft MND (Section 15.e, Transportation/Traffic, page 59), emergency vehicle access to and from the project site would be provided at Albright Way (South San Francisco) and Sherwood Drive (San Bruno). Design and materials for the emergency vehicle access would be developed in consultation with the City of San Bruno emergency service providers to assure adequate access and circulation.

Comment E-5: *Requests to be notified of any disruption in utility service during construction.*

Response: As conditioned by the City of San Bruno, the project sponsor would notify any homeowners in writing if the homeowner's utilities will be disrupted at any time due to project construction.

Comment E-6: *Requests information for project construction haul routes and suggests construction measures.*

Response: See Response to Comment B-2.

Comment E-7: *Suggests a second entrance/exit to and from the project site into South San Francisco.*

Response: See Response to Comment A-2.

Letter F: Erik and Miriam Roberson

Comment F-1: *Comment relates to changes in property lines along the project site's southern boundary as a result of the formal survey completed by project sponsor. Suggests the project sponsor complete improvements to private property (property not owned by the project sponsor) and the buffer area between the project site and existing residences.*

Response: See response to Comment E-1.

Comment F-2: *Suggests stop signs at the intersection of Evergreen Drive and Maywood Drive and the intersection of Evergreen Drive and Sherwood Drive and "Children at Play" signs.*

Response: See Response to Comments B-1 and E-3.

Comment F-3: *Disagrees with the project trip generation.*

Response: See Response to Comment B-3.

Comment F-4: *Suggests a second entrance/exit to and from the project site into South San Francisco.*

Response: See Response to Comment A-2.

Comment F-5: *Adequacy of project parking supply.*

Response: See Response to Comment E-2.

Comment F-6: *Suggest additional construction measures.*

Response: See Response to Comment B-2.

Letter G: Gerald and Nancy Sonnenburg

Comment G-1: *Suggests a second entrance/exit to and from the project site into South San Francisco.*

Response: See Response to Comment A-2.

Comment G-2: *Suggests stop signs at the intersection of Evergreen Drive and Maywood Drive.*

Response: See Response to Comment B-1.

Comment G-3: *Suggests that the park on the project site be accessible to all City residents.*

Response: The City will require that a public access easement be shown over the park on the final map, thereby allowing the general public use of the park.

Comment G-4: *Concern regarding eucalyptus tree removal.*

Response: As conditioned by the City of San Bruno, a number of trees would be removed as part of the proposed project. Pursuant to the Conditions of Approval, the proposed HOA shall maintain the eucalyptus tree grove located on the southern side of the project site and all common landscaped areas on the project site, and all eucalyptus trees on the project site will be cleaned, thinned, and maintained in accordance with certified arborist standards for such tree species (Parks and Recreation 1 and 3).

References

DKS Associates, *2396 Evergreen Drive Development Traffic Impact Analysis*, September, 2006.

DKS Associates, *2396 Evergreen Drive Development Traffic Impact Analysis Addendum to the Report*, September, 2006.

Federal Highway Administration. *Manual of Uniform Traffic Control Devices for Streets and Highways*, 2004.

Institute of Transportation Engineers *Parking Generation Manual*, 3rd Edition, 2004.

Transportation Research Board. *2000 Highway Capacity Manual*, 2000.